

memorandum



000020086

DATE: SEP 02 1992

REPLY TO: ERD:PS/SG:9722

ATTN OF:

SUBJECT: OU1 (881 Hillside) IM/IRA Operations

TO: J. M. Kersh, Associate General Manager
Environmental and Waste Management
EG&G Rocky Flats, Inc.


This memorandum is in response to your memorandum (92-RF-7693), dated July 9, 1992, concerning Operable Unit No. 1 (OU1) 881 Hillside Interim Measure/Interim Remedial Action (IM/IRA) operations. We have reviewed your response concerning the OU1 IM/IRA Operations and determined the response to be inadequate. The response was inadequate regarding two issues.

The first issue concerns the leaching of ethyl benzene and xylene from the effluent tanks. There was no indication in EG&G's response of how long the leaching process will last. If the two compounds leach for an extended period (several years), this could reduce the operating capacity of the treatment plant and increase the operating costs since the water will be recycled through the UV peroxide system prior to release. We are requesting that the coating specifications in the tank design be reviewed to determine if a wrong epoxy was specified or if a wrong epoxy was supplied by the vendor. This review could be very helpful in the design of future facilities.

The second issue concerns why the present configuration of the water collection system differs from the OU1 IM/IRA Decision Document. Regardless, we consider the change in design to raise potential legal issues with respect to not following the Decision Document as well as potentially spreading contamination and compromising the integrity of the French Drain. Integrity of the drain is potentially compromised by adding significant quantities of contaminated water to strata that was previously dry (and uncontaminated). This results in the potential of spreading contamination. Additionally, the French Drain was designed to collect water, not be an underground storage structure for contaminated ground water.

Consequently, you are instructed to change the collection points to separate locations as per the IM/IRA Decision Document. As part of this, you will need to notify us of a tentative schedule for doing so.

The tank coating specification information and a tentative implementation schedule for the collection points is due to us within four weeks of the date of this memorandum. If you have any questions, please contact either Paul Singh of my staff at extension 7565 or Scott Grace at 7199.


James K. Hartman
Assistant Manager
for Environmental Management

A-OU01-000800

cc:
A. Rampertaap, EM-453
J. Lehr, AMEM, RFO
E. Lee, EG&G, RFO
M. Arndt, EG&G
D. Smith, EG&G
M. Burmeister, EG&G
Harry Mann, EG&G